

EXHIBIT 27

1 THE HONORABLE THOMAS S. ZILLY
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 HUNTERS CAPITAL, LLC, et al.,

11 Case No. 20-cv-00983

12 Plaintiffs,

13 PLAINTIFF ONYX HOMEOWNERS
14 ASSOCIATION'S ANSWERS AND
15 RESPONSES TO DEFENDANT CITY OF
16 SEATTLE'S FIRST DISCOVERY
17 REQUESTS

v.

18 CITY OF SEATTLE,

19 Defendant.

20 Pursuant to Rules 26, 33, and 34 of the Federal Rules of Civil Procedure, Plaintiff Onyx
21 Homeowners Association (“Onyx” or “Plaintiff”) hereby responds and objects to Defendant City
22 of Seattle’s (“Defendant” or the “City”) First Discovery Requests containing Defendant’s first sets
23 of Interrogatories and Requests for Production. No admissions of any nature whatsoever are
24 implied or should be inferred from the answers, responses, and objections set forth below. Plaintiff
25 has answered these requests based on its current knowledge and understanding with respect to the
matters addressed. Discovery in this action is on-going. Plaintiff reserves its right to alter,
supplement, modify, or otherwise amend its responses as necessary or appropriate.

PLAINTIFF ONYX HOMEOWNERS
ASSOCIATION'S ANSWERS AND RESPONSES
TO DEFENDANT CITY OF SEATTLE'S FIRST
DISCOVERY REQUESTS
Case No. 20-cv-00983 - 1

LAW OFFICES
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1 have no relevance to the claims or defenses in this case. Plaintiff further objects to this request in
2 so far as calls for production of documents not in Plaintiff's possession or documents that are
3 otherwise publicly available and equally available to the City.

4 Without waiving any objection, and subject to continuing investigation, Plaintiff will
5 conduct a reasonable search for documents in its possession relevant to the claims and defenses
6 in this case and will produce responsive, non-privileged documents, if any, within a reasonable
7 time, on a rolling basis.

8 **REQUEST FOR PRODUCTION NO. 7:**

9 Please produce all documents (including without limitation emails and texts) reflecting any
10 communications between any plaintiff and any other person or business concerning any of the
11 CHOP activities alleged in the complaint.

12 **RESPONSE:**

13 Plaintiff objects to this request as vague, ambiguous, overly broad, unduly burdensome,
14 and duplicative in so far as it calls for the production of "all" documents and communications
15 involving any person, plaintiff, or business. Plaintiff further objects to this request in so far as calls
16 for production of documents not in Plaintiff's possession or documents that are otherwise publicly
17 available and equally available to the City.

18 Without waiving any objection, and subject to continuing investigation, Plaintiff will
19 conduct a reasonable search for documents relevant to the claims and defenses in this case and will
20 produce responsive, non-privileged documents, if any, within a reasonable time, on a rolling basis.

21 **REQUEST FOR PRODUCTION NO. 8:**

22 Please produce all documents reflecting any damages you claim to have suffered as a result
23 of any "lack of public-safety assistance" alleged in the complaint.

24 **RESPONSE:**

25 Plaintiff objects to this request as vague, ambiguous, overly broad, unduly burdensome,

1 and will produce responsive, non-privileged documents, if any, within a reasonable time, on a
2 rolling basis.

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4 DATED this 15th day of January, 2021.

5 By /s Patty A. Eakes
6 Patricia A. Eakes, WSBA #18888
7 Angelo J. Calfo, WSBA #27079
8 Tyler S. Weaver, WSBA #29413
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26 *Attorneys for Plaintiffs*

RESPONSES dated this 11th day of January, 2021.

ONYX HOMEOWNERS ASSOCIATION

VERIFICATION

STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

Wade Biller , being duly sworn, on oath says:

That he/she is the Board President of ONYX HOMEOWNERS ASSOCIATION;

that he/she has read the answers and responses to CITY OF SEATTLE'S FIRST DISCOVERY REQUESTS TO PLAINTIFF ONYX HOMEOWNERS ASSOCIATION, knows the contents thereof and believes the same to be true and correct.

SUBSCRIBED AND SWORN TO before me this _____ day of _____,
2021.

[PRINT NAME] _____
NOTARY PUBLIC in and for the State of Washington,
residing at _____
My appointment expires: _____

PLAINTIFF ONYX HOMEOWNERS
ASSOCIATION'S ANSWERS AND RESPONSES
TO DEFENDANT CITY OF SEATTLE'S FIRST
DISCOVERY REQUESTS
Case No. 20-cv-00983 - 26

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